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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	
)	Case No.: 2:19-cr-00301-GMN-DJA
Plaintiff,)	
)	STIPULATION TO CONTINUE THE
vs.)	CHANGE OF PLEA DATE
)	(Second Request)
JAMAJE BAILEY,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED by and between, Nicholas A. Trutanich, United States Attorney, District of Nevada, CHRISTOPHER LIN, Assistant United States Attorney, representing the United States of America, and JAMES ORONOZ, Esq., counsel for defendant BAILEY:

THAT THE CHANGE OF PLEA HEARINGS CURRENTLY SCHEDULED on August 5, 2020 at 1:00 P.M, be continued and reset no earlier than 30 days when convenient for the Court.

1. On March 16, 2020, the Chief Judge of the U.S. District Court for the District of Nevada issued Temporary General Order 2020-03, which found that due to the outbreak of the coronavirus disease 2019 ("COVID-2019") in the District of

1 Nevada, the declaration by the Governor of the State of Nevada of a public health
2 emergency due to the spread of COVID-19 in Nevada, and the declaration of local
3 emergencies by local governments due to COVID-19, including Clark County, the
4 Court has sustained “reduced ability to obtain an adequate spectrum of jurors,” and
5 it noted the effects of public health recommendations, including “social distancing
6 measures.” General Order 2020-03 accordingly continued all civil and criminal
7 trials until April 10, 2020, pending further order of the Court and found that “the
8 ends of justice are best served by ordering the continuances, which outweighs the
9 best interests of the public and any defendant’s right to a speedy trial under 18
10 U.S.C. § 3161(h)(7)(A).”

11 2. On March 19, 2020, the Chief Judge of the U.S. District Court for the District of
12 Nevada issued Temporary General Order 2020-04 (collectively with General Order
13 2020-03, “the General Orders”), which noted that “the COVID-19 pandemic has
14 continued to spread,” resulting in the need for “more aggressive social-distancing
15 measures.” The Court noted further that, “[o]n March 17, 2020, the Governor of the
16 State of Nevada ordered the closure of many business establishments and strongly
17 encouraged all citizens to stay home.” Accordingly, the Court ordered the
18 temporary closure of the Clerk’s office, and implemented other changes, including
19 “striving to eliminate in-person court appearances.” In the event any hearing must
20 go forward, the Court will conduct the hearing via video or teleconference. The
21 Court will vacate or amend General Order 2020-04 no later than April 30, 2020.

22 3. On March 30, 2020, TGO 2020-05 (collectively with TGO 2020-03 and TGO 2020-
23 04), noting that “the Judicial Conference of the United States found that emergency
24 conditions due to the national emergency declared by the President have affected

1 and will materially affect the functioning of the federal courts generally.” TGO
2 2020-05 further stated that felony pleas and sentencings could not be conducted in
3 person without “seriously jeopardizing public health and safety” and should only be
4 held via video conference if postponing the proceedings would cause “serious harm
5 to the interests of justice.” This authorization is effective for 90 days.

6 4. On April 9, 2020, the Chief Judge of the U.S. District Court for the District of
7 Nevada issued an Amendment to the Temporary General Order 2020-03 further
8 continuing criminal trials past April 10, 2020.

9 In light of the ongoing health concerns surrounding the COVID-19 virus, counsel
10 for defendant and counsel for the Government agree to this continuance. This continuance
11 is not sought for the purpose of delay but to adhere to recommendations related to
12 prevention and spread of COVID-19. Further, counsel for the defendant agrees that this
13 delay will not cause serious harm to the interest of justice and the defendant agrees. No
14 prejudice to the defendant will occur because of this continuance. The defendant agrees to
15 this continuance.

16 This is the second request for a continuance of the change of plea date.

17 DATED this 27th day of July, 2020.

18 NICHOLAS A. TRUTANICH
19 United States Attorney

20 /s/ Christopher Lin
21 CHRISTOPHER LIN
22 Assistant United States Attorney

23 /s/ James Oronoz
24 JAMES ORONoz, ESQ.
Counsel for Defendant BAILEY

Defendants.

ORDER TO CONTINUE THE CHANGE OF PLEA DATE